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21 Attorneys for Plaintiff and Counter-Defendant ViaSat, Inc.

22 UNITED STATES DISTRICT COURT
23 SOUTHERN DISTRICT OF CALIFORNIA

24 VIASAT, INC.

) Case No. 3:16-463-BEN-JMA

25 a Delaware corporation,

)

26 Plaintiff and Counter-Defendant,

) **Motion to File Under Seal Unredacted**

27 v.

) **Reply Memorandum in Support of**

28 ACACIA COMMUNICATIONS, INC.

) **ViaSat's Motion for Summary Judgment**

a Delaware corporation,

) **on Acacia's Counterclaim for Patent**

Defendant and Counter-Claimant.

) **Misappropriation**

) Hon. Dist. Judge Roger T. Benitez

) Hon. Magistrate Judge Jan M. Adler

)

) Case Initiated: January 21, 2016

)

Under Federal Rule of Civil Procedure 26(c), Local Rule 79.2(c), ECF
Administrative Policies and Procedures 2(j), and Paragraph 1 of the Stipulated Protective
Order (Dkt. No. 29), as amended (Dkt. No. 47), Plaintiff and Counter-Defendant ViaSat,
Inc. (“ViaSat”) respectfully requests that the Court file under seal portions of the Reply
Memorandum in Support of ViaSat’s Motion for Summary Judgment on Acacia’s
Counterclaim for Patent Misappropriation.

ARGUMENT

Certain limited portions of the Reply Memorandum in Support of ViaSat’s Motion for Summary Judgment on Acacia’s Counterclaim for Patent Misappropriation contain confidential information that Acacia designated as Confidential or Highly Confidential – Attorneys’ Eyes Only under the Stipulated Protective Order (Dkt. No. 29), disclosure of which would harm the competitive standing of the parties and could be used to the parties’ competitive disadvantage outside of this case.

Specifically, ViaSat seeks to seal the following documents:

(a) Reply Memorandum in Support of ViaSat’s Motion for Summary Judgment on Acacia’s Counterclaim for Patent Misappropriation contains information that Acacia designated as Highly Confidential – Attorneys’ Eyes Only. ViaSat previously moved to file the same material under seal. Docket Nos. 87, 123. Acacia did not oppose these motions. Thus, ViaSat seeks to seal this document for the same reasons ViaSat has already described in its Motion to Seal its Memorandum in Support of ViaSat’s Motion for Summary Judgment on Acacia’s Counterclaim for Patent Misappropriation, Docket Nos. 87, 123.

CONCLUSION

For the foregoing reasons, ViaSat respectfully requests that the Court seal portions of the Reply Memorandum in Support of ViaSat’s Motion for Summary Judgment on Acacia’s Counterclaim for Patent Misappropriation. A Proposed Order will be emailed to efile_benitez@casd.uscourts.gov and efile_adler@casd.uscourts.gov.

Dated: February 26, 2018

Respectfully Submitted,

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